

MELINDA HAAG (CABN 132612)
United States Attorney

MIRANDA KANE (CABN 150630)
Chief, Criminal Division

PATRICIA SPALETTA (CABN 156788)
Special Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
Telephone: (415) 522-6031
Facsimile: (415) 436-7234
Patricia.Spaletta@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 11-0066 RS
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	EXCLUDING TIME UNDER 18 U.S.C. § 3161
v.)	
)	
RODOLFO PUEBLA NAPOLES,)	
)	
Defendant.)	
_____)	

The parties appeared before the Court on March 8, 2011. With the agreement of counsel for both parties, the Court found and held as follows:

1. The parties agree to an exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161, from March 8, 2011 to March 29, 2011, in light of the need for the defense to review additional discovery in this case. Failure to grant the requested continuance would unreasonably deny defense counsel reasonable time necessary for effective preparation of counsel, taking into

1 account the exercise of due diligence.

2 2. Given these circumstances, the Court found that the ends of justice served by excluding
3 the period from March 8, 2011 to March 29, 2011, outweigh the best interest of the public and
4 the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

5 3. Accordingly, and with the consent of the defendant, the Court ordered that the period
6 from March 8, 2011 to March 29, 2011, be excluded from the Speedy Trial Act calculations
7 under 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

8
9 SO STIPULATED:

10
11 MELINDA HAAG
United States Attorney

12
13 DATED: March 14, 2011


_____/s/
14 PATRICIA SPALETTA
Special Assistant United States Attorney

15
16 DATED: March 14, 2011

_____/s/
17 LOREN STEWART
Assistant Federal Public Defender

18
19 SO ORDERED.

20
21 DATED: 3/16/11 _____



22 THE HON. RICHARD SEEBORG
United States District Judge